



ANNUAL REPORT

2024



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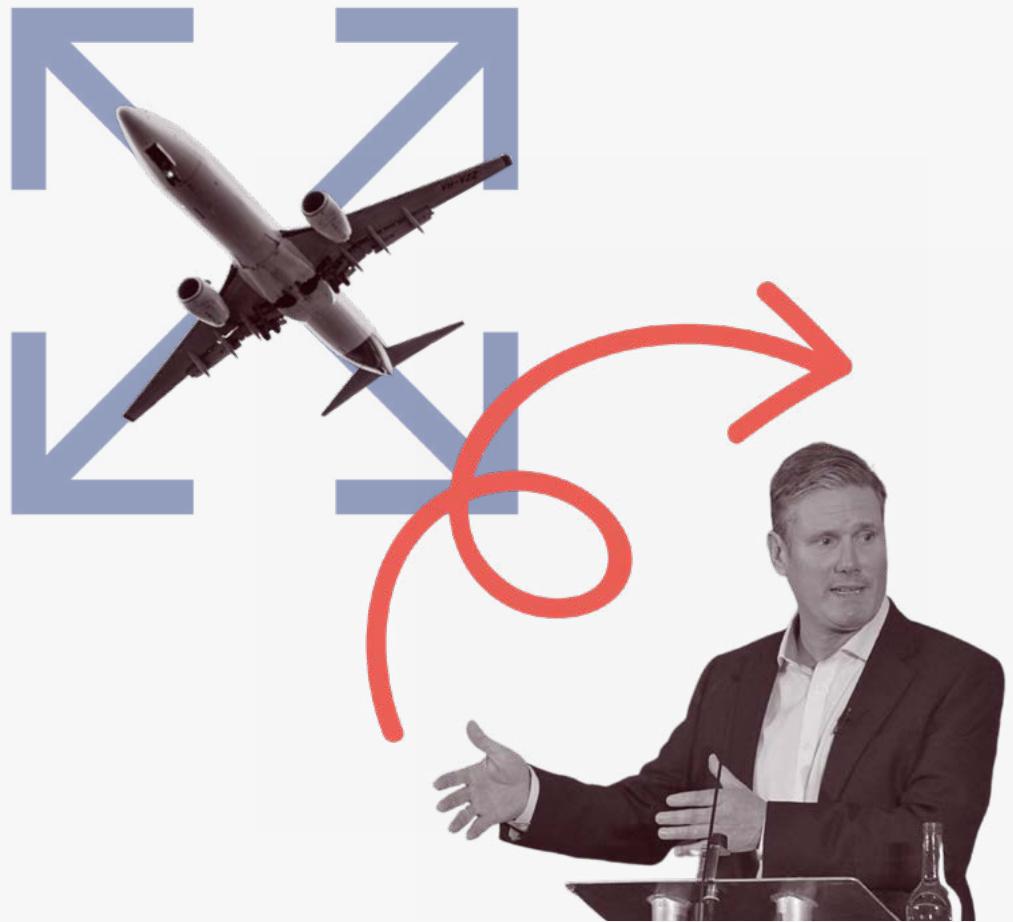
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1 The election and revamp of 'Jet Zero'



Much of 2024 was dominated by the general election. While the results were known in a matter of hours after the polls closed, the impact of a new labour Government on aviation policy took months to become clear. With policy discussions put on pause six weeks before the election, and summer recess and party conferences impacting on the new Government's early months in office, almost five months elapsed before a clear agenda emerged.

The commitments made in the Labour manifesto were held, and the new Government has focused on so-called 'sustainable aviation fuels' (SAF) and airspace modernisation. Before the end of the year it had legislated for a [SAF mandate](#) that will require 10% of all the fuel uplifted at UK airports to come from eligible alternatives to kerosene by 2030.

In the Chancellor's first budget there was an increase in private jet taxation and a

consultation to extend the scope to smaller private jets.

The Government also chose to revamp the Jet Zero Council, renaming it the Jet Zero Taskforce and creating a new plenary and expert group to steer its work. AEF has accepted invitations to sit on both of these groups.

The new Government also inherited the difficult question of airport expansion, with a parliamentary timetable requiring the determination of plans for Gatwick and Luton.

In the following sections you can read more about our work in 2024 in all these policy areas.

Finally, a big thank you and our best wishes for the future to Cait Hewitt who moved on to new challenges after 16 years at AEF.

2 Planning and airport expansion

Just as the examination in public of Luton's plans to grow to 32 million passengers a year (mppa) was coming to a close, the six-month examination of Gatwick's proposal to use its emergency runway regularly as a second runway, began in late February.

With plenty of well-informed and resourced local opposition by campaign groups CAGNE and GACC, AEF focused on the national implications of the associated increase in greenhouse gas emissions on climate policy. We provided several proofs of evidence and supported the local campaign groups at the issue specific hearings. Specifically, we obtained the detailed forecasts of movements and emissions for Gatwick from the previous Government's Jet Zero modelling through a Freedom of Information request. This revealed that there was likely to be no growth in traffic compared to 2019 if expansions at other London airports were also allowed to take place.

Leigh Day, writing on behalf of AEF and the new coalition of organisations opposing expansion, No Airport Expansion (NAE), also reminded the Government that there was a strong case for reviewing the Airports National Policy Statement which was voted on by Parliament in 2018, a year before net zero became law. This will be an important issue in 2025 as the Government has to determine whether these two schemes, and potentially Heathrow, can proceed.

"We are deeply concerned that the significant increase in carbon emissions that these expansions will generate will undermine the UK's ability to meet it's Net Zero plans, and erode the savings envisaged in the Government's Clean Growth Plan. It will also bring unacceptable levels of noise, air pollution and disruption for local communities."

*AEF and 7 other NGOs writing to the newly-appointed Secretary of State for Transport
December, 2024*

Eyes on Bristol Airport campaigners protesting in 2024

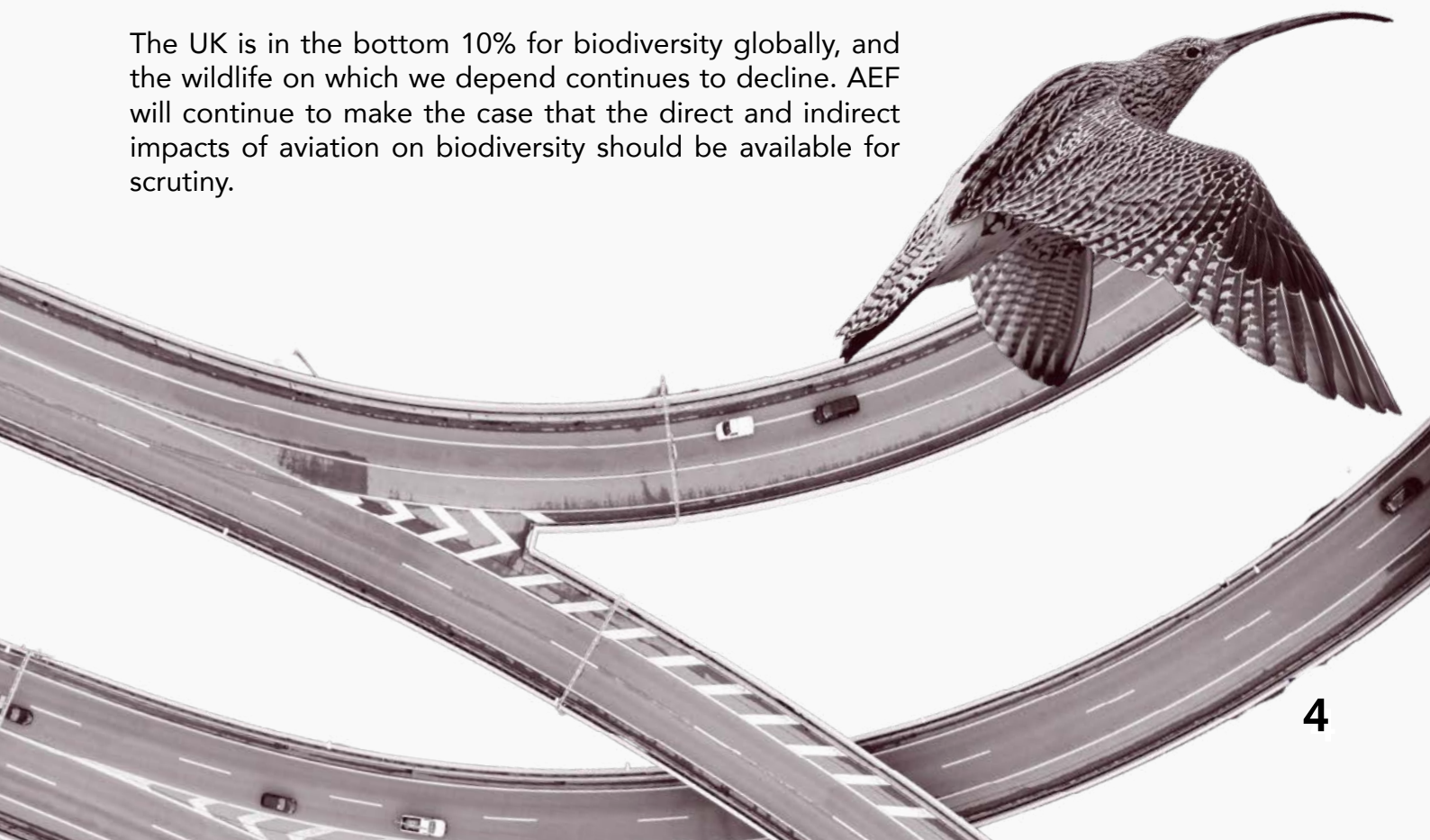
3 Biodiversity

In 2024, AEF looked closely at the practice of lethal bird control around airports for safety reasons. We discovered that between 2020 and 2023, **30,773** birds were shot, **740** chicks destroyed, **5971** eggs destroyed, and **1806** nests destroyed under licences issued to airports by Natural England. These figures included endangered species ordinarily protected in law.

Maintaining safety at airports is crucial. However, in the interests of nature conservation, AEF wants to see greater transparency about lethal bird controls, including the numbers of birds and species involved, the names of the airports carrying out the controls and the steps taken by the relevant competent authority to monitor licence use. To obtain the information above, we had to submit a Freedom of Information request. That's unacceptable.

We also noted a worrying research gap. Independent reports on the indirect impacts of light, noise and air pollution resulting from aircraft operations on biodiversity around UK airports are scant. That gap should be closed.

The UK is in the bottom 10% for biodiversity globally, and the wildlife on which we depend continues to decline. AEF will continue to make the case that the direct and indirect impacts of aviation on biodiversity should be available for scrutiny.



4 Noise, airspace, general aviation and air pollution



The AEF's Airspace and Noise Community Forum (ANCF), which is open to all groups and individuals impacted by aircraft noise, has continued working to secure stronger aircraft noise policies and to ensure community views are properly taken into account in the airspace modernisation process, in line with the priorities agreed at the Forum's bi-annual meetings.

In 2024 the ANCF's focus areas included the aircraft noise attitudes and night noise research programmes being led by the CAA and DfT respectively, which are likely to be important factors in future policy, and Defra's Noise Action Plan process. We engage with DfT and CAA officials regularly and are represented on the Department's noise and airspace modernisation engagement groups. We also responded, through the AEF, to [consultations on night flights](#) and the proposed new Airspace Design Service.

In addition, we presented to the DfT and to the General Aviation Partnership on the lack of accountability and enforcement in the light aircraft sector. In 2025, the team will be looking into ways to influence and work with local planning authorities to help close this regulatory gap.

AEF worked with Transport & Environment in the launch of their [important report on ultra-fine particles](#) (UFPs). Aircraft are known sources of UFPs, which could pose serious health risks for those living around airports. Using extrapolated data, the report suggests that at the four UK airports studied – London Gatwick, Stansted, Heathrow and Manchester – UFP from aircraft could be associated with, in total, an additional 41,000 cases of high blood pressure, 44,000 cases of diabetes and 2,200 cases of dementia.

Tim Johnson, Director at AEF, said: “Communities living around airports have been raising the alarm around air pollution for years and this report vindicates their position that more should be done.”
Mr Johnson called for a “long overdue” review of UK air pollution, noting that the last evaluation took place more than 20 years ago.

*Tim Johnson, talking to
The Shropshire Star
June, 2024*

5 Consumer information




In 2024, AEF carried on pushing for better provision of environmental information to air travel consumers. This can help to change consumption patterns and push service providers to offer less environmentally damaging products in response to consumer demand.

Internationally, this work consisted of maintaining our position on the advisory committee for Google's Travel Impact Model (TIM). The TIM is a freely-available emissions estimation tool that is used to provide details of emissions by airline and flight, and is used in many leading travel booking websites, including Google Flights. The Advisory Group made good progress in 2024 in examining how TIM could reflect non-CO₂ impacts on a per flight basis, especially contrails, in the future, as well as other updates to improve the model's accuracy.

Providing consumer information for flights has been on the radar of UK policy makers since being included in the CAA's Environmental Sustainability Strategy and the government's Jet Zero Strategy (both in 2022). The CAA put out a call for evidence on what environmental information should be provided to people when they are looking for flights in early 2023. This was followed by another [consultation](#) in October 2024, requesting input on a draft set of principles for airlines and companies that advertise or sell flights to follow when calculating and providing information.

Our key message in responding to the consultation is that we urge the CAA to take timely and ambitious action on providing consumer information. Any policy proposals need to match the CAA's initial ambition and must go beyond a voluntary reporting requirement for airlines. Other suggestions in our response included providing details on the non-CO₂ impacts of aviation and ensuring that emissions data is provided with context, in a format that is easy to understand and useful. The European Commission also consulted on their approach to creating a Flight Emissions Label for airlines in October 2024. Our response outlined similar messages of ensuring any label is mandatory and provides accurate, comprehensive and relevant information that is presented in a clear and easily understandable manner.

Labelling flights with environmental information has the potential to have a significant positive impact. Public awareness of aviation emissions has been shown to be low, but consumers have indicated that they do want to receive this information. For a sector that is highly challenging to decarbonise, with complicated (and often unsuccessful) technological pathways to lower emissions, ensuring that people understand the issue and the environmental damage being caused could be a very powerful tool in the long-term.



"A percentage mandate for alternative fuel in an industry hungry for growth can't guarantee [net zero]," she said. "So for the time being, it remains the case that the best way to cut emissions from flying is to fly less."

Cait Hewitt, former Policy Director at AEF, talking to the Financial Times April of 2024

6 Alternative aviation fuels

The industry's answer to its growing contribution to climate change rests entirely with so-called sustainable aviation fuel. We say 'so-called' because the sustainability of many of the feedstocks used to make SAF has to be assessed and not just assumed. In many cases, how we assess lifecycle emissions and what is included, or excluded, in the calculations can provide more than one answer. To demystify this subject, we held a series of well-attended [webinars](#) early in 2024 to showcase a series of commissioned expert reports. Cerulogy presented its work on SAF, while the Tyndall Centre at the University of Manchester and the Priestly Centre at the University of Leeds outlined the findings of work on the potential role of ammonia as a fuel and the likely non-CO2 impacts of using hydrogen planes respectively.

But, concerningly, the general understanding of SAF remains low. Aiming to bring clarity to the debate, we produced an infographic showing that SAF and kerosene produce exactly the same carbon emissions when combusted, and highlighting that the claimed net savings are dependent on how the fuel is produced. We appeared in the media often providing a counter view to the industry, setting out sustainability and fraud concerns as well as the challenges in scaling up production pathways using waste products. Working with other NGOs, we also sent a clear message to Government that the industry, and not taxpayers, should bear the costs of SAF in response to growing industry claims that they needed help with its high cost, at least two to three times more than kerosene.

7 Air Passenger Duty and aviation tax

Aviation continues to enjoy a favourable taxation position in the UK, and AEF's work to tackle that was a major focus of our policy work in 2024. We continued to lobby and raise awareness about the lack of taxation on kerosene, which makes flying artificially cheap compared with other modes of transport, particularly driving. If aviation paid tax and VAT on its fuel at the same rate as motorists pay on theirs, the potential revenue would amount to over [£12 billion a year](#).

We commissioned a [new infographic](#) to explain the legal mechanism of introducing a new kerosene tax – in contrast to popular belief, there is no global treaty preventing such a move. Instead individual countries would need to renegotiate their Air Service Agreements bilaterally – our new infographic showed our calculations that up to 82% of fuel sold in the UK could potentially be covered by a kerosene tax if agreements were amended with the EU, and the ten most popular destinations.

In September, [we wrote](#) to the Treasury with suggestions of how aviation could be taxed more in advance of the Chancellor's first Autumn budget. We were pleased when an increase in Air Passenger Duty (APD) – particularly the 50% rise on certain private jets – was announced by the Chancellor. APD has been allowed to fall below inflation in recent years, and luxury private jet flights have almost completely escaped taxation. Three-quarters of private jet passengers pay the same APD as premium economy passengers, or pay no APD at all. With the huge rise in private jet flights in the UK since Covid (one in ten flights in the UK is currently a private jet flight) this was a glaring loophole. We have also contributed to a new government consultation which will look to reform private jet APD even further. With our partners at the New Economics Foundation and Possible, we have



contributed to the development of proposals for a frequent flyer levy, which would be aimed at tackling the problem of individuals flying multiple times a year. We believe it is fairer that those who fly multiple times a year should pay more for their carbon emissions through the development of progressive taxation measures.

8 Other matters

AEF travel emissions tracker

AEF’s travel policy requires staff to avoid travelling by air whenever possible, focusing instead on opportunities to attend or hold meetings virtually, or where an in-person presence is considered important to our work programme, to use lower carbon modes of travel such as rail. Occasionally, some air travel is necessary, for example to attend meetings of the UN’s International Civil Aviation Organisation (ICAO) where we represent a coalition of environmental NGOs. In the interests of transparency, all staff travel emissions are monitored and reported annually. We always take steps to minimise our emissions but we don’t have a policy to annually reduce emissions. Why? Our emissions footprint is largely dominated by the few trips by air that we take each year, but the location of ICAO meetings can vary: a meeting that takes place in Europe can be located in South America the following year. We are currently exploring how best to compensate for our travel emissions. The following table shows total staff travel emissions for 2022, 2023 and 2024.

Year	Total carbon emissions t/CO2e
2022	4.4
2023	6.2
2024	3.3

Fundraising and finances

We aim to keep membership fees affordable to ensure that everyone can have access to our advice and information service. We are grateful to our funders and donors for helping to subsidise the costs of providing these services, and for supporting our work programme more generally. Apart from membership fees, AEF’s work is dependent entirely on philanthropic and charitable funders. We do not receive public funds or donations from industry. AEF continues to operate within budget and maintains a positive balance of funds. To ensure appropriate scrutiny of our work programme and to promote good governance, we are grateful for the oversight provided by our Executive Council, which is elected annually by our membership.

AEF Staff



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Director



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Head of Planning & Outreach



Charles Lloyd Lead,
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Tim Thomas
Financial Administrator



Cait Hewitt, *former Policy Director*

AEF's aim is:

- to protect the environment, public health and quality of life through securing policies and measures that ensure effective limits on noise, emissions and other environmental impacts from aviation.

AEF's objectives are:

- to seek effective legislation, policies and other measures by working with local, national and international policy-making and legislative bodies;
- to promote practical solutions through consultation and co-operation with AEF members, regulatory and public bodies, the aviation industry, and others;
- to support our members and affected communities in liaising with decision-makers and other stakeholders;
- to provide advice, analysis and information;
- to publicise and promote the role and responsibilities of the Federation.

Special thanks to Crispin Hughes and Susi Arnott for letting AEF use their '[no step](#)' photoseries for this annual report.

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